

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE
COMMISSION

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-61-67)
October 13, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

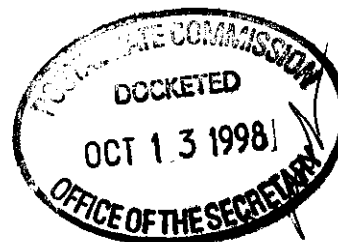
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

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Acting Assistant Director



OCA/USPS-T3-61. Please refer to your response to OCA/USPS-T3-34(b). Please explain the rationale for choosing 1800 workhours as the number of hours in a "resource year."

OCA/USPS-T3-62. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 11, the "TECHNICAL HELP DESK RESOURCE YEARS, Help Desk Volumes/Durations."

- a. For 1999, please confirm that the number 2,991, "Total First Time Call Hours," is calculated by multiplying the "Total Number of Users" (5,981) by one-half hour (0.50). If you do not confirm, please explain.
- b. For 1999, please confirm that the number 1,794, "Total On-going call hours," is calculated by multiplying the "Total Number of Users" (5,981) by one-tenth hour (0.10) and the number of on-going calls per year (3). If you do not confirm, please explain.

OCA/USPS-T3-63. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 11, the "TECHNICAL HELP DESK RESOURCE YEARS, Help Desk Volumes/Durations."

- a. Please confirm that the Mailing Online Technical Help Desk or the PostOffice Online Help Desk will receive four calls (1 initial call plus 3 "on-going" calls) from each Mailing Online customer. If you do not confirm, please explain.
- b. Please confirm that the duration of the calls referred to in part (a) of this interrogatory is 48 minutes (30 minutes for one initial call + (6 minutes * 3 "on-going" calls)). If you do not confirm, please explain.

- c. Please confirm that 50 percent of "Total call hours" will consist of customer inquiries responded to by the Mailing Online Technical Help Desk, and 50 percent will consist of inquiries responded to by the Post Office Online Help Desk. If you do not confirm, please explain.
- d. Please confirm that the duration of the calls referred to in part (a) of this interrogatory responded to by the Mailing Online Technical Help Desk is 24 minutes ((30 minutes for initial calls + 6 minutes for each "on-going" call) * 0.50). If you do not confirm, please explain.
- e. Please confirm that the average duration of each call referred to in part (a) of this interrogatory responded to by the Mailing Online Technical Help Desk is 6 minutes (24 minutes / 4 calls). If you do not confirm, please explain.

OCA/USPS-T3-64. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 6.

- a. Please confirm that, of the 12 "Average customer sessions per user per year," 4 will involve telephone inquiries concerning Mailing Online. If you do not confirm, please explain.
- b. Please confirm that one-third (4 / 12) of the "Average customer sessions per user per year" will involve telephone inquiries concerning Mailing Online. If you do not confirm, please explain.
- c. Please confirm that 23,924 ($71,772 * 0.3333$) of the total annual number of Mailing Online transactions in 1999 will involve telephone inquiries concerning Mailing Online. If you do not confirm, please explain.

OCA/USPS-T3-65. Please refer to your response to OCA/USPS-T3-31. Please confirm that the "cost driver" for the costs of the Mailing Online Technical Help Desk and the PostOffice Online Help Desk associated with Mailing Online is the estimated number and duration of calls. If you do not confirm, please explain.

OCA/USPS-T3-66. Please refer to USPS-LR-1/MC98-1, Attachment 2, at pages 12-13, concerning the "Technical Help Desk."

- a. For the "YR 1999," please confirm that the total variable costs of the technical help desk are \$282,000. If you do not confirm, please explain.
- b. For the "YR 1999," please confirm that the total variable costs of \$282,000 are incurred to respond to calls generating 2,392 "Technical Help Desk Call Hours." If you do not confirm, please explain.
- c. For the "YR 1999," please confirm that the variable cost per hour of the technical help desk is \$117.89 ($\$282,000 / 2,392$ hours). If you do not confirm, please explain.
- d. For the "YR 1999," please confirm that the variable cost per call of the technical help desk is \$11.79 ($\$117.89 / (60 \text{ minutes} / 6 \text{ minutes per call})$). If you do not confirm, please explain.

OCA/USPS-T3-67. Please refer to your response to OCA/USPS-T3-17, which refers to the PostOffice Online Help Desk as being "run by a contractor." Please provide a copy of the contract for the PostOffice Online Help Desk.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
October 13, 1998